



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

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2012 JUN 22 P 2:56

**SENSITIVE**

June 22, 2012

**MEMORANDUM**

**TO:** The Commission

**FROM:** Anthony Herman  
General Counsel

Daniel A. Petalas  
Associate General Counsel for Enforcement

**BY:** Mark D. Shonkwiler *MS*  
Assistant General Counsel

Kimberly D. Hart *KDH*  
Attorney

**SUBJECT:** MUR 6515 (PFFW, *et al.*)

**RE:** Pre-Probable Cause Conciliation Agreement

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**I. INTRODUCTION**

Attached is a revised conciliation agreement that we recommend the Commission accept in order to settle knowing and willful violations of 2 U.S.C. §§ 441b(a) and 441f by the Professional Fire Fighters of Wisconsin ("PFFW") and eleven former PFFW officers. Attach. 1. The attached redline version highlights changes made to the agreement originally approved by the Commission. Attach. 2.

PFFW and the individual Respondents have agreed to pay a civil penalty of \$58,000,

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MUR 6515 (PFFW, *et al.*)  
Memorandum to the Commission  
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23 **III. DISCUSSION**

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25 We recommend acceptance of this agreement. The \$58,000 civil penalty the  
26 Commission-approved offer, and 300% of the amount in violation, reflecting the seriousness of  
27 the violations.  
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19 In sum, we believe that the negotiated agreement represents a fair resolution of this  
20 matter, and recommend that the Commission accept the attached signed conciliation agreement  
21 with PFFW and the individual Respondents.  
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23 **IV. RECOMMENDATIONS**  
24

- 25 1. Accept the attached conciliation agreement with the Professional Fire Fighters of  
26 Wisconsin, and Tracy Aldrich, Robert G. Baird, Michael Drury, Richard F. Gale,  
27 John C. Gee, Troy W. Haase, Lance A. Hanson, Patrick Kilbane, Len Orlando,  
28 Ann Watzka, and Michael J. Woodzicka.  
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30 2. Approve the appropriate letters.  
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32 3. Close the file.  
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